

# Exhibit 2

Page 1

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----  
4 NEW YORK IMMIGRATION COALITION, ET AL.,

Plaintiffs,

5 vs. Case No. 1:18-CF-05025-JMF

6 UNITED STATES DEPARTMENT OF COMMERCE, ET AL.,

7 Defendants.  
8 -----

9 Washington, D.C.

10 Wednesday, August 29, 2018

11 Deposition of:

12 DR. JOHN ABOWD

13 called for oral examination by counsel for  
14 Plaintiffs, pursuant to notice, at the office of  
15 Arnold & Porter, 601 Massachusetts Avenue NW,  
16 Washington, D.C., before KAREN LYNN JORGENSEN,  
17 RPR, CSR, CCR of Capital Reporting Company,  
18 beginning at 9:06 a.m., when were present on  
19 behalf of the respective parties:

20 Veritext Legal Solutions

Mid-Atlantic Region

1250 Eye Street NW - Suite 350

21 Washington, D.C. 20005  
22

1 P R O C E E D I N G S

2 WHEREUPON,

3  
4 VIDEOGRAPHER: Good morning. We're going  
5 on the record at 9:06 a.m. on Wednesday August 29,  
6 2018. Please note that the microphones are  
7 sensitive and may pick up whispering and private  
8 conversations. Please turn off all cell phones  
9 and place them away from the microphones, as they  
10 can interfere with the deposition audio. Audio  
11 and video recording will continue to take place  
12 unless all parties agree to go off the record.

13 This is Media Unit 1 of the video  
14 recorded deposition of Dr. John Abowd taken by  
15 counsel for the plaintiff in the matter of the  
16 New York Immigration Coalition, et al., v.  
17 United States Department of Commerce, et al. This  
18 case is filed in the U.S. District Court of the  
19 Southern District of New York. This deposition is  
20 being held at the law offices of Arnold & Porter  
21 located at 601 Massachusetts Avenue Northwest,  
22 Washington, D.C. 20001.

1           My name is Dan Reidy from the firm  
2   Veritext Legal Solutions, and I'm the  
3   videographer. The court reporter is  
4   Karen Jorgenson from the firm Veritext Legal  
5   Solutions.

6           I am not authorized to administer an  
7   oath. I am not related to any party in this  
8   action, nor am I financially interested in the  
9   outcome.

10          Also, counsels' appearances will be noted  
11   on the stenographic record rather than orally at  
12   this time.

13          Will the court reporter please swear in  
14   the witness?

15                   DR. JOHN ABOWD,  
16   called as a witness, and having been first duly  
17   sworn, was examined and testified as follows:

18           THE WITNESS: I do.

19                   EXAMINATION BY MR. HO:

20          Q   Dr. Abowd, before we get started, I just  
21   want to confirm something on the record with your  
22   counsel.

1 are on the record.

2 BY MS. GOLDSTEIN:

3 Q Dr. Abowd, I think I have just one more  
4 question.

5 If you will turn to the last page of the  
6 exhibit in front of you Bates marked 1320.

7 A Okay.

8 Q In light of the Census Bureau's analysis  
9 of Alternative C versus Alternative D, do you  
10 agree that reinstatement of a citizenship  
11 question on the 2020 decennial census is necessary  
12 to provide complete and accurate data in response  
13 to the DOJ request?

14 A No.

15 Q And that is the position of the  
16 Census Bureau, correct?

17 A Yes.

18 MS. GOLDSTEIN:

19 Q Thank you, Dr. Abowd.

20 I just want the record to reflect and  
21 that plaintiffs -- and I speak to all plaintiffs  
22 with respect to this -- are leaving the record

\* \* \* \* \*

CERTIFICATE OF REPORTER

I, KAREN LYNN JORGENSEN, RPR, CSR, CCR the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that the said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



KAREN LYNN JORGENSEN, RPR, CCR, CSR

Dated this 1st day  
of September , 2018.